



November 10, 2016

CDDO Peer Review of

Shawnee County CDDO

Review Team:

Melissa McDaniel, KDADS

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CDDO REVIEW REPORT SUMMARY OF FINDINGS

Shawnee County Peer Review
November 10, 2016

1. GENERAL COMMENTS

The review team thanks the CDDO staff for all of their hard work, preparation and coordination to make the review as effective and efficient as possible. Shawnee County Peer Review was held on November 10, 2016 at 9:00 a.m. Prior to November 10th, Shawnee County was last reviewed in 2011. Currently Sabrina Winston serves as Director of Shawnee County CDDO and was the primary point of contact for KDADS throughout the review process. Shawnee County CDDO generously volunteered to be the first review site as KDADS re-launches the statewide CDDO Peer Review Process.

2. IDENTIFIED STRENGTHS

1. **Affiliates and Collaboration** – CSP Survey results from respondents were overwhelmingly positive for all of the asked questions. CDDO does a good job through their affiliate meetings and surveying to ensure CSPs are able to provide feedback to the CDDO in order to improve area wide systems management, networking and educational opportunities.
2. **Quality Assurance** – The CDDO's quality assurance/quality enhancement group has a strong system in place with BCI for reporting critical incidents. Despite the state's Adverse Incident Reporting System (AIRS) not being specifically mentioned in the "Quality Assurance Regulatory and Contractual Requirements" Policy, the state feels strongly Shawnee County CDDO has been instrumental in helping to get the word out about this system. CDDO has invited KDADS staff to present and offer training on the AIR system two times in 2016. CDDO Director frequently contacts state staff to cross walk the BCI system against the AIR system to ensure everyone has the necessary information. The state would like to thank CDDO (specifically the Director) for working in cooperation with the state to help promote the AIR system and working with affiliates on increasing the level of compliance.

3. RECOMMENDATIONS FOR CDDO

1. **Outcome 2:** CDDO maintains policy and procedure changes that are approved as required – Monitoring Activity 2.
Issue: There is no systematic annual review of CDDO policies.

Recommendation: Perform an annual review of policies and revise as appropriate complying with the regulatory process for any substantive changes.

- “Gatekeeping – Referral to I/DD Public/Private Intermediate Care Facilities” Policy – Ensure policy is reflective of the new KDADS Gatekeeping Policy.
- “Functional Assessment” Policy –Do staff track data for the timeframes outlined in the policy?
- “Targeted Case Management Training Requirements” Policy - Indicates CDDO can prevent billing. Consider re-wording since the MCO pays the TCM provider.
- “Changing Targeted Case Management Services” Policy - Policy indicates the TCM provides the choice as well as fills out the choice form which presents a conflict of interest.
- “Funding Requests” Policy - If the funding is not approved, add some information about the appeal process.
- “Crisis Funds” Policy – If an individual is denied, provide a copy of the appeal process. Change the language to supported or recommended since KDADS is the one that makes the approval.
- “Service Reductions” Policy – Please re-visit this policy. It appears this policy was last revised in 2012. The MCO is the entity who awards the HCBS service. How does the CDDO complete a reduction in service?
- “Plans of Care” Policy - We no longer complete Plans of Care. The MCO now does an Individual Service Plan. Would suggest providing more clarification around this policy or rename it.
- “Shawnee County CDDO informed of Suspected Abuse, Neglect, Exploitation Reports made by Affiliates” Policy –What is your process when a report is made anonymously?
- “Local Funding Service Access to Waiting List” Policy - The waiting list date is the date the BASIS was completed not the date they applied.

2. Outcome 3: CDDO completes all management responsibilities as required – Monitoring Activity 3d.

Issue: Following a sampling of eligibility determinations, comprehensive options counseling forms were present in each file, but not all were initiated properly.

Recommendation: Ensure every person indicates whether options counsel was received or declined options and initiated as necessary.

4. RECOMMENDATIONS FOR KDADS:

1. Outcome 3: CDDO completes all management responsibilities as required – Monitoring Activity 3b.

Issue: Following a sampling of functional assessments, 2 files were past 7 days of entry with no explanation.

Recommendation: KDADS will finalize BASIS & Waitlist Policy to provide more guidance for CDDOs to be able to measure the 7 day timeframe appropriately.

5. FINDINGS:

1. Outcome 3: CDDO completes all management responsibilities as required – Monitoring Activity 3j.

Issue: As you navigate through the CDDO website, TARC is an active link at the bottom of every page displayed as:
© 2006 - TARC, 2701 SW Randolph Ave, Topeka, KS 66611. (785) 232-0597.

Recommendation: The TARC listing/link should be removed to ensure separation in function.

Issue: “Individual Rights and Responsibilities” portion of the website contains no information or direction on what an individual should do if one of their rights has been violated.

Recommendation: Include the appropriate contact information for the applicable agencies: APS/CPS, Attorney General’s office, Adverse Incident Reporting system etc.

2. Outcome 13: CDDO maintains an effective dispute resolution system that meets regulatory requirements.

Monitoring Activity 13.

Issue: Dispute Resolution Process is not always being referenced in necessary places such as Funding Requests Policy and Crisis Funds Policy.

Recommendation: Ensure Dispute Resolution process is referenced and interwoven through your other policies where a determination/decision of some kind has been made. Also, if you distribute letters/notices to individuals, please take the time to always include a copy of the Dispute Resolution Policy so people don’t have to track it down. In the instances where notifications are sent electronically, it would be appropriate to provide a link to the information.

6. BEST PRACTICE RECOMMENDATIONS:

1. QA/QE meeting notes are reactionary based upon individual cases. What is the CDDO doing in terms of trending what they are receiving and sharing information with their affiliates?

2. CDDO may consider the development of a newsletter. This may be a good way for CDDO to stay in touch with people (especially those who are waiting for services). Individuals or family members may opt in to receive an electronic newsletter so they can stay informed.

3. It does not appear the CDDO has any outdoor signage to indicate who they are/where they are located. For a person who is not familiar with the campus, this would be helpful.

SUMMARY: Overall, the review was a positive one which identified CDDO strengths as well as opportunities for improvement. The CDDO of Shawnee County has been very flexible and responsive in our conversations with them throughout this process. There were a couple of items we had conversations about such as the KAMIS entry date listed on the functional assessment cover sheet and the website font. In anticipation of this report being returned to the CDDO, they took it upon themselves to go ahead and make the necessary adjustments to these two items. The review team appreciated the CDDO's cooperation and hospitality.

Peer Review Tool

Review Team Members:

- 1) Melissa McDaniel, Program Integrity Manager, KDADS
- 2) Colin Rork, PICS, KDADS
- 3) Linda Young, PICS, KDADS
- 4) Anna McNamara, Affiliate Coordinator, JOCO CDDO
- 5) Cherie Trieb, Consumer Advocate Volunteer

Date of Review: November 10, 2016

CDDO Name: Shawnee County CDDO
Address: 2701 SW Randolph Ave. Topeka, KS
Contact Person: Sabrina Winston, Director
Phone Number: 785-232-5083
Email: swinston@sncddo.org

ACRONYM REFERENCE GUIDE

- “ANE” Abuse, Neglect, Exploitation
- “BASIS” Basic Assessment and Services Information System
- “CDDO” Community Developmental Disability Organization
- “COCM” Council of Community Members
- “CSP” Community Service Provider
- “ICF” Intermediate Care Facility
- “ICF/IID” Intermediate Care Facility for Individuals with Intellectual Disability
- “KDADS” Kansas Department for Aging and Disability Services
- “PD” Position Description
- “QA” Quality Assurance

Scoring Compliance Key

(1) =Yes (2) =No (7) = NA

Program Contact:

KDADS Program Integrity
Community Services and Program Commission
503 S. Kansas Ave.
Topeka, KS 66606-3906
(785) 291-3632
Melissa.mcdaniel@ks.gov

Desk Review Activities - Section I						
Review of Policies and Procedures, Website & Newsletters						
#		1	2	7	Strengths & Comments	Findings & Recommendations
1.	CDDO ensures that its policies are distinct to the CDDO, and CDDO operated CSP policies are distinct to CSP. CDDO and CSP functions are governed by two distinct sets of policies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There was no mention of any CSP in the CDDO policies. All policies were specific to the CDDO.	The header on all provided policies reads “TARC Policy Manual – CDDO Section” which seems misleading. TARC and Shawnee County should have a policy manual separate one another if they don’t already.
2.	Does the CDDO have a newsletter? If yes, review one years’ worth. Does the CDDO ensure written communication demonstrates impartiality of the CSPs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CDDO does not distribute either an electronic or hard copy newsletter. Sabrina mentioned this is something the CDDO may consider doing.	This would be another way to outreach to individuals. This would be a nice way to stay in contact with individuals who are on the waiting list. They could opt in to receive an electronic newsletter if they’d like to. You can archive these on your website.
3.	Does the CDDO have a company website? If so, does website ensure impartiality of CSPs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Website content does ensure impartiality of CSPs. There is nothing to indicate any sort of favoritism of one CSP over another. TARC has a separate website from Shawnee County CDDO.	Review staff agreed website font was small and difficult to read. As of 11-17, it appeared the CDDO already made an adjustment to a larger font size. Remove active TARC link displayed at the bottom of the website.

On-Site Review – Section II

Outcome #1

K.A.R. 30-64-20 - CDDO Maintains data regarding CDDO Review Improvement Plans (if any) requested during past review period including rebuttal and date.

#		1	2	7	Strengths & Comments	Findings & Recommendations
1.	CDDO submitted a performance improvement plan to KDADS as requested. There is documented plan available. Review team and KDADS approved plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Any Performance Improvement Plans the CDDO may have been issued would be from the year 2011 or older. CDDO is not being held accountable to this regulation this peer review cycle.	N/A
1a.	CDDO maintains and monitors data for	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Any Performance Improvement Plans the	N/A

	performance improvement plan. CDDO maintains data in a manner that allows evaluation.				CDDO may have been issued would be from the year 2011 or older. CDDO is not being held accountable to this regulation this peer review cycle.	
1b.	CDDO is responsive to data results. CDDO has revised the performance plan as needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Any Performance Improvement Plans the CDDO may have been issued would be from the year 2011 or older. CDDO is not being held accountable to this regulation this peer review cycle.	N/A
1c.	Completion of improvement plan items occurred. Items completed within timeline and is verified by data and/or outcomes.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Any Performance Improvement Plans the CDDO may have been issued would be from the year 2011 or older. CDDO is not being held accountable to this regulation this peer review cycle.	N/A

Outcome #2

K.A.R. 30-64-21 - CDDO Maintains policy and procedure changes that are approved as required.

#		1	2	7	Strengths & Comments	Findings & Recommendations
2.	CDDO will initially and on an on-going basis, follow the regulatory process when developing policy. Did CDDO run policy/procedure changes through the appropriate process: COCM Input, Board Approval, KDADS approval?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Sabrina indicated there have been no major changes in policy.	Any substantial changes to policy need to be sent through process outlined in the contract. Upon completion, distribute the policy via the IDD upload utility tool. IDD Program Manager and Commissioner will review and approve policy changes.

Outcome #3

K.A.R. 30-64-22 - CDDO completes all management responsibilities as required.

#		1	2	7	Strengths & Comments	Findings & Recommendations
3.	CDDO maintains affiliate agreements with all affiliates. Does CDDO have current affiliate agreement for each affiliate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Worked with CDDO staff to review dates for all agreements against the master list of affiliates.	For future reviews, would like all current affiliate agreements to be printed off and readily available for review team. It was difficult trying to navigate the BCI system to review each affiliate agreement. There was no date listed for Life Bridge.
3a.	If the CDDO has cancelled or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It's been over 5 years since the CDDO	N/A

	suspended an affiliate agreement, was the action consistent with regulatory criteria? Criteria: 1) provider did not accept rate equal to that established by the Secretary 2) Provider has established pattern of not abiding by service area procedures 3) Entering into an agreement would seriously jeopardize the CDDO's ability to fulfill its responsibilities.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	has had to cancel or suspend an affiliation agreement.	
3b.	Did CDDO report BASIS information to KDADS in the agreed upon timeframe? (All functional assessments shall be entered into KAMIS within seven calendar days of completion of the assessment.) KDADS will sample completed assessments and dates to compare against KAMIS entries (5 days to initiate assessment from date of request, 30 days to complete assessment from date of request, 7 days to enter in to KAMIS).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	20 files/assessments were reviewed. 4 were past 7 days with explanation of need from Doctor of School (papers). 2 files were past 7 days of entry with no note of explanation.	Ensure BASIS information is being entered in to KAMIS w/in the agreed upon timeframes. KDADS will provide more clarification.
3c.	Following a sample of crisis/exception requests, do CDDO processes/procedures meet state guidelines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reviewed 5 crisis requests or 100% w/in the last year. All five met the state guideline.	If you are mailing out crisis request determination letters hard copy, also enclose a copy of the dispute resolution process to accompany the letter. It's difficult to include a website link in the body of a letter unless you are distributing them electronically. Be sure to include a clear explanation of appeal rights in Letter to TCM and in Policy.
3d.	Following a sample of eligibility determinations, do CDDO	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	19 files were reviewed. All forms were present. Eligibility was completed. 2	Ensure every person receives options counseling and initials as appropriate.

	processes/procedures meet state guidelines? For example, was each person provided with “comprehensive options counseling?” Is the functional assessment/or reassessment occurring within the stated timeframe?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	were not initiated which would indicate they did not receive options counseling.	
3e.	Following a sample of provider case transfers inside and outside the CDDO catchment area, does CDDO ensure processes/procedures meet state guidelines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7 people came in to Shawnee County and all 7 received the services they came with they were able to receive the same or necessary services upon transitioning in to Shawnee County.	
3f.	Following a sample of ICF/IID request for admissions, did the CDDO follow appropriate “gatekeeping” policies and procedures to ensure appropriate processes were followed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Conducted a sampling of ICF requests over the course of the least year and process met policy. All 3 Shawnee County was their home county.	
3g.	Following a sample of affiliation agreements, does CDDO ensure agreements are uniform for like services? CDDO operated CSP must have an affiliation agreement with CDDO. Affiliation agreement cannot extend advantages not offered to other CSPs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Shawnee County has an agreement with TARC and it is the exact same as all the other affiliate agreements (uniform).	
3h.	Does evidence and documentation demonstrate that affiliated service providers have opportunity for input on CDDO area system management? Correspondence and interviews verify	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review of bi-monthly affiliate meeting minutes and “2015 Shawnee County Satisfaction Survey.” Corresponding CSP survey monkey question “Does the CDDO maintain a process to solicit (ask	

	the CDDO makes input opportunities available for all affiliates.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	you) for your input on CDDO policies/procedures, major local systems change and statewide initiatives for which they represent your area? If not, please explain” 90% of respondents indicated YES, opportunities are available.	
3i.	Does CDDO have any individuals who work for both the CDDO and the CSP? If so, review a sample of PD's.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There are three people: Executive Director, TCM/CDDO Coordinator and Finance Director.	
3j.	CDDO will maintain a separation in function between the CDDO and CSP management and operations. It is clear which functions are CDDO and which are CSP. If there are personnel that work for both entities their position description reflect such. Paper and electronic information is stored securely to ensure CSP division of a CDDO does not have access.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There are personnel who work for both entities. However, it is reflected in the job description which duties are performed for TARC versus the CDDO.	

Outcome #4

K.A.R. 30-64-22 - Unbiased affiliation process

#		1	2	7	Strengths & Comments	Findings & Recommendations
4.	CDDO must have written policies/procedures that are approved in accordance with Article 64 requirements that clearly address the CSP affiliation process, and states the affiliation requirements. Evidence of a policy/procedure and it is followed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO has a policy that addresses how to become an affiliate titled “Entering into an affiliate agreement with Shawnee County CDDO/TARC” Policy clearly outlines the affiliation requirements. CDDO also offers a “How to Affiliate” Manual on the CDDO website.	Would recommend adding to the “Entering into an affiliate agreement with Shawnee County CDDO/TARC” Policy on #4 The CDDO may refuse to enter into or continue an affiliate agreement if: “The CDDO demonstrates to the satisfaction of the secretary that being required to enter into the affiliating agreement would seriously jeopardize the CDDO’s ability to fulfill its responsibilities either under the regulations of Article 64 or pursuant to its

4a.	CDDO must maintain documentation that identifies the current status of all individuals/entities/applicants requesting affiliation, including notification of appeal/grievance rights. Evidence of a process for affiliation and its monitoring.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO just recently started tracking affiliation inquiries on a spreadsheet. SC CDDO had four inquiries for affiliation 5-12-16, 7-21-16, 7-25-16 and 10-4-16. Once an inquiry is received, SC CDDO sends the "How to affiliate" manual which contains the Dispute Resolution information.	contract with the secretary."

Outcome #5

K.A.R. 30-64-22 - Unbiased service option information

#		1	2	7	Strengths & Comments	Findings & Recommendations
5.	CDDO policies and procedures are implemented as written for sharing, with persons requesting/receiving services, impartial information regarding all service options. The policy and procedures ensure all CSP options are shared.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provides a case management choice form, service provider choice form, Affiliate List and Shawnee County CDDO Resource Guide. Following the information sharing portion of the process, SC CDDO has a conversation with the individual about what they are waiting for in terms of services and what services may look like once they are able to be accessed. Applicable consumer interview question indicates people did receive information on all service providers in their area.	

Outcome #6

K.A.R. 30-64-22 - Access to HCBS & Day/Res State Aid funding is not dependent on the person's chosen service provider.

#		1	2	7	Strengths & Comments	Findings & Recommendations
6.	CDDO policies and procedures for accessing state aid funds are made available on request. An impartial process for determining funding decisions is in place.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided Fiscal Management Policy, Funding Requests Policy, Crisis Funds Policy, Service Reductions Policy, Local Funding Service Access Waiting List Policy. Also reviewed Shawnee	Crisis Funds policy should reference appeal rights.

					County CDDO Funding Request Form, Crisis Funding Request Form, State Aid Funds reports which break funds out by person served and affiliate provider. CDDO reiterated State Aid is “tied up right now” so the person would go on to a waiting list. State Aid is used to pay for Day, Res, In Home supports, it could also be used for a Tier 0 individual. State Aid is allocated 1x during the year and the funding committee meets 1/week. Funding committee consists of Sabrina Winston, Coleen Hernandez, Jess Reling, Laura Marple and Billie Padilla. Reviewed 2 letters and forms for funding approval and denial. If funding is denied, the letter contains information about appeal rights.	
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Outcome #7

K.A.R. 30-64-23 - CDDO will serve as single point of entry and maintain an effective application, eligibility determination & service choice process.

#		1	2	7	Strengths & Comments	Findings & Recommendations
7.	Eligibility staff have been trained per regulation. CDDO has developed a training program and such have been approved by COCM. Evidence eligibility staff have completed identified requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reviewed CDDO Liaison Policy, training records and training certificates for Jess Reling. Shawnee County has one eligibility staff. Jess has met the identified requirements.	CDDO indicated new eligibility staff have yet to be introduced to COCM. They will do so at next council meeting. COCM should approve training program and this should be reflected in meeting minutes.
7a.	CDDO policies and processes are impartially implemented as written for informing potential persons eligible for and requesting initial services of a	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SC CDDO provides affiliate list, case management choice form, service provider choice form and the Resource Guide. The TCM Choice Form outlines for different	

	CSP in that CDDO area. Policies and procedures are implemented as written.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	options and the individual in need of services is asked to check the one that applies “I have received the information regarding all TCM agencies” “I decline the information regarding all TCM agencies” “I will contact agencies myself” or “Please send a general referral letter to all agencies” Conducted a sample of TCM forms from files and all contained choice form and all were filled out appropriately.	
7b.	CDDO policies and procedures are impartially implemented as written for the process that is utilized for persons wishing to change CSPs in that CDDO area. Policies and procedures are implemented as written.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Shawnee County provided “Changing Targeted Case Management Services,” Case Management Choice Form and Service Provider Choice Form. For this regulation, we also found the “Continuity & Portability (Within) Shawnee County” Policy to be applicable. The majority of the individuals we interviewed had never changed service providers so we were unable to gain any additional information as evidence pertaining to this regulation.	

Outcome #8

K.A.R. 30-64-23 - Informed Choice of Community Service Providers

#		1	2	7	Strengths & Comments	Findings & Recommendations
8.	CDDO effectively maintains documentation of service provider change/transition requests/notifications. Notifications are maintained.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SC CDDO provided generic Status Action Form and Generic Transition Checklist. KDADS conducted a sample of individuals who transitioned to ensure documentation meets state standards.	

Outcome #9

K.A.R. 30-64-25 - CDDO will maintain a process in coordination with affiliates that results in services being offered and provided in a way that does not discriminate against any persons because of severity of person's disability.

#		1	2	7	Strengths & Comments	Findings & Recommendations
9.	CDDO process is effective. All persons that request services, for whom funding is available, receive requested services. Review: affiliate agreement; policy/procedure; any agreements for provider specialization and capped capacity.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SC CDDO does not have a specialized services affiliate agreement. Master Affiliate list reflects with a star the names of affiliates not currently accepting referrals with a specification on type of service. The CDDO provides an email notification when changes are to be made open/closed or change in staff in BCI affiliate section. Reviewed Uniform Access to Services Policy. Also, each affiliate agreement has section to address “Discrimination in Delivery of Services Prohibited”	When referencing other Policies inside a specific Policy, such as the case with the “Uniform Access to Services Policy,” please also supply them with a copy of the Dispute Resolution Policy or provide information on where to locate. It should not be the burdensome to an individual or family member to have to track down additional information.
9a.	CDDO identifies number of persons the Secretary of KDADS has determined inappropriate for community services because the person presents a clear and present danger to self or community	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	SC CDDO has never been involved in a case where an individual has been determined “inappropriate for community services” by the Secretary.	

Outcome #10

K.A.R. 30-64-26 & 30-64-27 - CDDO will maintain a locally developed impartial QA process that reasonably addresses regulatory requirements.

#		1	2	7	Strengths & Comments	Findings & Recommendations
10.	QA process addresses the required regulatory requirements including: Choice, Person-Centered, Rights & Responsibilities, Paid/Delivered, Third Party payment responsibility and ANE reporting information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reviewed “Quality Assurance Regulatory and Contractual Requirements Policy,” Person Centered Support Plan Review Checklist, Third Party Liability Insurance Form, QA/QE Meeting Notes. QA/QE committee meets 2/month. ANE	Continue to partner with the state to educate and require affiliates to report in AIR.

				information is reported via the BCI system.	
10a	CDDO maintains evidence that the same remediation and follow-up process is utilized for all CSPs for same services.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reviewed “Dispute Resolution Policy” along with a sampling of corrective actions plans to ensure uniformity.

Outcome #11

K.A.R 30-64-29 - CDDO will develop, implement and maintain a gatekeeping system for public and private ICFs/IID that is in compliance with regulations.

#		1	2	7	Strengths & Comments	Findings & Recommendations
11.	Is CDDO informing person/family/guardian of available community services choices and types in or near the person’s home annually?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reviewed “Gatekeeping – persons living in public/private ICF-IID outside Shawnee County where Shawnee County is their Home County” Policy and “Gatekeeping – Referral to I/DD Public/Private Intermediate Care Facilities” Policy along with a sampling of “Authorization for Release of Information” form to indicate an individual has been informed and received information about CSP options.	
11a	Does CDDO have documentation of ICF/IID requests?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided list of ICF/IDD referrals. Reviewed referral and pre-screen documentation to ensure state requirements were met.	

Outcome #12

K.A.R 30-64-31 - CDDO maintains a council of community members that meets the regulatory requirements.

#		1	2	7	Strengths & Comments	Findings & Recommendations
12.	Did CDDO provide a list of the council of community members?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reviewed COCM list, COCM tri-fold brochure and Nominee Ballot.	
12a	Does the council membership meet the regulatory requirements? Comprised of a majority of persons	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reviewed 6 years of COCM roster. Council currently meets the regulatory criteria. It appears there are currently 12	It is unclear whether or not there is a good process to rotate members on and off the committee in order to meet the regulatory

	served, family members and/or guardians and includes affiliates of the CDDO for no more than 2 consecutive 3 year terms.			persons served and guardians versus 11 CDDO or affiliate representatives.	requirement.
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Outcome #13

K.A.R. 30-64-32 - CDDO maintains an effective dispute resolution system that meets regulatory requirements.

#		1	2	7	Strengths & Comments	Findings & Recommendations
13.	CDDO has policies/procedures implemented as written and approved in accordance with Article 64 requirements, and clearly addresses how persons requesting/receiving services and family members receive information regarding the CDDO complaint/grievance process is accessed.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Reviewed “Dispute Resolution” Policy. Policy is in accordance with article 64 requirements.	Dispute Resolution process was not always referenced in other policies as necessary such as Funding Requests Policy and Crisis Funds Policy. Ensure Dispute Resolution is woven through all policies where a determination/decision was made.
13a	CDDO will maintain evidence that the dispute resolution process is made available to all persons requesting it and to any persons whom a negative action has been initiated.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Dispute Resolution Policy is located on the website. Dispute Resolution is mentioned as part of the Shawnee County Resource Guide. Annually, each person receives the “Authorization for Release of Information” (ROI) Form to indicate they received the CDDO Resource Guide which contains the Dispute Resolution information. The ROI form is offered at time of eligibility determination and for re-assessment. CDDO provided a sampling of eligibility and crisis requests which both contain information on how to access Reconsideration or the Dispute Resolution Process.	

13b	CDDO must maintain evidence of all incidence in which the dispute resolution process was initiated by any party.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided quarterly complaint tracking form as required by the state. The tracking form indicates one complaint was received 8-23-16.	KDADS acknowledges the quarterly complaint tracking is a new practice for SC CDDO. State would like to see this as a continued method for tracking complaints.
13c	CDDO must evaluate the collected data in effort to utilize trends to improve the CDDO system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CDDO provided CIR by Provider cover sheet which provides incident totals by category including: Welfare, Health/Medical, Safety, Staff, Reported to CPS/APS and Other. CDDO also captures data from the Personal Awareness Satisfaction Tool.	

CONSUMER/FAMILY INTERVIEW 14 total respondents	Y	N	N/A	COMMENTS
1) Have you ever changed service providers? If so, how did you receive information about all your service options?	2	6	6	<p>1) Did interview, qualified. Not in services at this time.</p> <p>2) On wait list at this time.</p> <p>3) 3rd therapist, left agency.</p> <p>4) Yes, through packet and recommendation from service provider.</p> <p>5) No, have never changed service providers.</p> <p>6) No, have never changed service providers.</p> <p>7) No, have never changed service providers.</p> <p>8) No, have never changed service providers.</p>
2) Did you receive information on all service providers in your area when you found out you had funding and could begin to the process of selecting a provider?	8	1	5	<p>1) Would like info again, but not funded.</p> <p>2) Not funded.</p> <p>3) Just who had openings.</p> <p>4) Received in packet from CDDO upon completion of eligibility determination.</p> <p>5) Received a list from evaluator following assessment. However, noted list was very outdated; phone numbers not working, not participating in Autism waiver etc. Found MCO to be most helpful in finding available services.</p> <p>6) Yes, provided a list of service providers at eligibility meeting.</p>

				7) Could not remember
3) Do you know who to contact if you want to change service providers? If so, who?	5	3	6	<p>1) Not explained. 2) Can't remember. 3) Not sure, family services? 4) MCO/CDDO 5) Yes, CDDO 6) Yes, CDDO 7) Yes, case manager/CDDO</p>
4) Do you believe the eligibility determination process is understandable and timely? If not, were you kept informed about the reason for any delay? If not please explain. (Interviewer: Review the definition of "eligibility determination process" prior to asking this question.)	10	3	1	<p>1) I think so, can't really remember. 2) Turned in necessary paperwork in January. Approved in June 2016. It took 6 months. 3) Took about one month. I am happy with them. 4) Took one month. 5) About one month (4 weeks). Thought it was going to be a difficult process but it wasn't. 6) Case manager told her wait list is years long. It is mind blowing to her. 7) Was kept somewhat informed, but the process took a long time.</p>
5) Did you understand the eligibility application process? If not, please explain.	11	2	1	<p>1) I think so, can't really remember. 2) Very easy to get it done. 3) Somewhat. Case manager from TARC does not keep in touch. 4) Yes, had help from a social worker.</p>
6) Do you believe the service referral process was timely? If not, please explain. Reference definition of service referral.	10	3	1	<p>1) Not providing it except for TCM. 2) No, took a long time for services to get back to her with a decision; don't hear much from them now that they have services either.</p>
7) Are you aware that you can appeal or request a review of a decision made by your CDDO? If not, explain.	11	2	1	<p>1) I think so, can't really remember. 2) Don't recall getting this. 3) Don't remember this.</p>
COMMUNITY SERVICE PROVIDER INTERVIEW 30 total respondents	Y	N	N/A	COMMENTS
8) Does the CDDO have an effective process for completing the annual BASIS assessment? If no, please explain?	30	0	0	<p>1) Review and completion of the BASIS tool. 2) Believe yes, but not knowledgeable about their process. 3) Yes it does. 4) Meets requirements.</p>

				5) I assume they do, we are only the FMS provider. 6) Shawnee County Provides TCM Training making TCM fully aware of protocol. 7) TCM schedule one year out per policy. 8) Yes, we get notified timely but some issues remain with understanding of terminology. 9) They do a good job of this and have very competent BASIS Screeners, any change in the present system by the state would be a detriment to clients served by CDDO.
9) Does the CDDO maintain a process to solicit (ask you) for your input on CDDO policies/procedures, major local systems change and statewide initiatives for which they represent your area? If not, please explain.	27	3	0	1) We receive email with an adequate period of time before response is due. 2) I am not aware of any discussions that have taken place. 3) Affiliate meetings. 4) Meets Requirements. 5) I would assume they do, we are only the FMS provider and not engaged in any changes to local systems that they have. 6) Stakeholder Meetings. 7) But very seldom. 8) Yes but only because we have a representative on the Quality Assurance and providers council, otherwise no. 9) This is a well-managed, competent, CDDO. The basic standards are above average across the line for every CDDO function.
10) Does the CDDO share information about your CSP with persons seeking services?	24	6	0	1) On list of all providers. 2) Affiliate List. 3) On the web site. 4) We are on the website and in written materials provided to TCMs. 5) I am not aware of any information that has been shared. 6) I believe list is provided to eligible HCBS recipients. 7) Provides documentation of affiliated CSP's. 8) Detailed information based system. 9) I do not know. 10) Providing person with Options Counseling & Provider List. 11) Our services are very limited in this CDDO area and they work well with us concerning our choice to limit services. 12) Area seems fair and honest. 13) Limited license not accepting.

				14) Email on hard to place clients. 15) E-Mails. 16) The CDDO hands out an affiliate list but neutrality of comments has no guarantee or process. The CDDO is also part of a large day provider and TCM organization. 17) We only get that information after they have selected us as the FMS provider. 18) I believe so, but not sure exactly, as we don't get a lot of referrals.
11) Does the CDDOs literature demonstrate impartiality regarding the CSPs in your area?	26	4	0	1) Unknown. 2) I believe list is provided to eligible HCBS recipients. 3) Yes it does. 4) I have not seen their literature so I do not know. 5) Provider Affiliate List with all CPS Providers. 6) We choose not to market our services in this CDDO area. We are affiliated to serve consumers who have moved to this area from our primary service area. 7) Just listed in the brochure. 8) Other than the list of providers I am not aware of any documentation.
12) Are you aware of communication in which the CDDO benefitted one CSP over another? If yes, please explain.	2	28	0	1) No I do not. 2) I do not know. 3) I would not be aware of this unless Out agency was involved. I have heard rumors. 4) No but I am aware of communications where the CDDO commented negatively about this CSP for getting referrals from outside the CDDO area including statements that this CSP was bringing in crazies.
13) Does the CDDO manage an effective process for persons to access your services? If not, please explain.	29	1	0	1) I believe list is provided to eligible HCBS recipients. 2) I do not know, it is not shared with us. 3) See above. 4) Follow written policy. 5) Children's residential options needed to be clarified - left many voice mails and rarely heard back. 6) Yes, but the entire concept is somewhat inept because we are getting a lot if not most our referrals from outside our CDDO area.
14) Does the CDDO maintain and share (if requested) a list of names of those persons interested in services who have consented to release their names?	24	6	0	1) The information about the provider is shared. If an individual is interested in a provider and hasn't connected for some reason, then the CDDO would provide the info to the provider. 2) Have not seen a list, but have not asked for one either.

				3) I do not know. 4) BCI. 5) When requested. 6) Not sure. 7) Not that I have been made aware. 8) We do not contact the CDDO asking if there are individuals looking to self-direct their services. 9) I believe so, but not 100%. 10) n/a.
15) Does your CSPs grievance/dispute resolution process refer the person to the CDDO if the issue is unresolved? If not, please explain.	28	2	0	1) Not certain. 2) I do not know. 3) Do not know agency has not had issues. 4) Not sure.
CDDO STAFF INTERVIEW SABRINA WINSTON, DIRECTOR	Y	N	N/A	COMMENTS
16) Has the CDDO refused to affiliate with a provider? If so, was the appropriate regulatory criteria applied?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No.
17) Has the CDDO cancelled/suspended an affiliate agreement? If so, was the appropriate regulatory criteria applied?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Not recently. It would have been July 2011 (five years ago). They had an affiliate who was having difficulty paying bills, not paying staff etc. SC CDDO went through corrective action process with no success.
18) Does the CDDO solicit input from all affiliates regarding policies/procedures, major local systems change and statewide initiatives for which they represent your area? If so, how?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Don't solicit, but they could comment during affiliate meetings.
19) Does the CDDO maintain separate in CDDO/CSP functions? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Separate phone lines, fax, letterhead, websites, separate Board of Directors, computer system is separate, Policies are separate
20) Do you explain the difference between the CDDO and CSP functions to families and consumers? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	During initial point of contact, they have this conversation. People tend to think the CDDO is TARC.
21) Do all CSPs in your area serve anyone requesting services, regardless of severity of	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	It is difficult, providers struggle with meeting the requirement "severity of disability"

disability? If not, please explain	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
22) Is the consumer always present for their BASIS assessment? If not, please explain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This is the expectation of the CDDO. They require this of their BASIS screeners. CDDO staff will conduct “drive-by” from time to time to ensure this is the case. BASIS policy outlines (in red) the individual being assessed must attend at least a portion of the assessment.
23) Does the CDDO QA process assure services are provided in a manner consistent with Article 64 including: Choice, Person-Centered, Rights & Responsibilities, Paid/Delivered, Third party payment responsibility, Report ANE? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes, “you do as much oversight as you can.” Use BCI for critical incident reporting system. Also conduct random sampling of persons served to ensure quality.
24) Does the CDDO inform persons and providers of the dispute resolution process? If so, how?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Dispute Resolution information can be located in the Resource Guide. “Yes, but we could do a better job. However, we don’t have a lot of disputes or complaints. Biggest one is typically a BASIS /Tier Change. I couldn’t remember the last time we had to have a hearing.” CDDO is typically able to resolve all issues outside of a formal process.